

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LCCS GROUP,)	
)	
Plaintiff,)	Civil Action No. 1:16-cv-05827
)	Honorable Amy J. St. Eve
v.)	
)	JOINT MOTION FOR
)	PROTECTIVE ORDER
A.N. WEBBER LOGISTICS, INC., et al.,)	
)	
Defendants.)	

JOINT MOTION FOR PROTECTIVE ORDER

Plaintiff LCCS Group (“Plaintiff”) and Defendant Interplastic Corporation (“Interplastic”), by and through counsel and pursuant to Fed. R. Civ. P. 26(c)(2), jointly move this Court for an appropriate protective order relating to certain financial information requested by Interplastic in its Second Set of Discovery Requests. In support of this Joint Motion, the parties state as follows:

1. On September 19, 2017, Interplastic propounded its Second Set of Discovery Requests on Plaintiff.
2. Interrogatory No. 14, subpart (b) requested Plaintiff, for each member of the LCCS Group, to “[s]tate the amount of money, in United States Dollars, assessed or allocated by you to that member as part of that member’s agreement to join the LCCS Group.”
3. On October 19, 2017, Plaintiff served its Responses to Interplastic’s Second Set of Discovery Requests. Plaintiff responded to Interrogatory No. 14(b) that “[e]ach member of Plaintiff’s group has been assessed on the same basis as what Plaintiff has offered to allow Interplastic to join the Plaintiff LCCS Group,” but did not provide the individual amounts paid,

as those amounts are confidential. Instead, Plaintiff offered to enter into a stipulated protective order.

4. By voicemail October 20, 2017 and by email dated October 23, 2017, counsel for Interplastic indicated Interplastic was agreeable to a protective order.

5. The parties have agreed to the terms of the protective order. The parties' proposed Protective Order is attached hereto as Exhibit A.

WHEREFORE, for the foregoing reasons, Plaintiff and Interplastic jointly request the Court enter the proposed Protective Order, or a similar and appropriate protective order, relating to the amounts paid by each LCCS Group member, and for such other and further relief as the Court deems just and appropriate under the circumstances.

Dated: November 2, 2017

Respectfully submitted,

THE JUSTIS LAW FIRM LLC

/s/ Rachel D. Guthrie

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ATTORNEY FOR DEFENDANT
INTERPLASTIC CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2017, a copy of the foregoing Joint Motion for Protective Order was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the filing through the Court's Electronic Case Filing System.

/s/Rachel D. Guthrie
Rachel D. Guthrie